

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

**DEC** 2 6 2006

REPLY TO THE ATTENTION OF:

WC-15J

# CERTIFIED MAIL 70010320 0005 8920 7097 RETURN RECEIPT REQUESTED

Kevin Schlueter Plant Manager General Electric Company 709 West Wall Street Morrison, IL. 61270

RE:

NPDES Compliance Inspection General Electric Company

Morrison, IL

Dear Mr. Schlueter:

On June 29, 2006, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the General Electric Company facility located at 709 West Wall Street, Morrison, IL. The purpose of the inspection was to evaluate compliance with certain requirements of the National Pollutant Discharge Elimination System (NPDES) Storm Water Program; specifically, storm water discharge requirements of the NPDES General Permit ILR002888 under 40 Code of Federal Regulation Parts 122.26 (b)(14) and 122.28.

During the inspection, several potential violations were noted as reflected in the enclosed report. Specifically, General Electric appeared to fail conducting storm water inspection, and failed to submit an annual inspection report as required under the NPDES Permit ILR002888. Please provide a written response within thirty (30) calendar days of receipt of this letter. In your response include a description of actions initiated to correct the noted potential violations including documentation of those actions, if not provided already to the agency.

I have also enclosed a copy of document titled "U.S. EPA Small Business Resource" which lists compliance assistance resources that may be of assistance to you. We appreciate your cooperation in addressing the issues identified in the inspection report. If you have any questions or concerns regarding this letter, please contact Sangsook Choi of my staff at (312) 353-1869.

Sincerely,

Cheryl Newton, Acting Chief

Enforcement and Compliance Assurance Branch

Water Division

Enclosures

cc: Dennis Conner, IEPA w/enclosure

Gary Tresenriter, City of Morrison w/enclosure

James Cowser, General Electric Company

## CWA COMPLIANCE EVALUATION INSPECTION REPORT U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: Compliance Evaluation Inspection (Industrial Storm Water and Pretreatment)

Facility: General Electric Company, 709 West Wall Street, Morrison, IL 61270

NPDES Permit Numbers: ILR002888 and 2005-EP-4651

Date of Inspection: 6/29/2006

**EPA Representatives:** 

Sangsook Choi, Environmental Engineer, 312-353-1869

State (City) Representatives:

Gary Tresenriter, Superintendent of Water and Sewer, 815-772-4319 Shane Osborn, Chief Operator, 815-772-4319

**Facility Representative:** 

James Cowser, EHS Manager, 815-772-1349
Kevin Schlueter, Plant Manager, 815-772-1260
Larry Vanderton, Lab Technician
David Bond, Facility Manager and Eric Johnson, GE Motors and Control
Group Leader participated in a follow-up conference call on 7/11/06.

Report Prepared by:

Sangsook Choi, Environmental Engineer, 312-353-1869 choi.sangsook@epa.gov

Report Date:

Sept. 25, 2006

Inspector Signature

#### **BACKGROUND**

The purpose of this report is to describe, evaluate and document General Electric Company compliance with the Clean Water Act (CWA) at their Morrison facility in Illinois on 6/29/2006.

The facility manufactures plastic and metal parts for automotive controls. The manufacturing operations includes plastic molding, metal fabrication, plating, brazing, annealing, die casting, assembly, etc. The plating processes include nickel line (electroless), tin line, and zinc line, and the fabrication processes involve plastic molding and die casting. The facility operates 6 days per week and 3 shifts with 130 fulltime workers.

All sanitary waters are discharged to the City sewer and GE installed 3 cooling towers for water conservation purpose in 2000, and consequently reduced water usage drastically from 60 M total incoming water flow to 14M. The electroless nickel solution is not treated at the facility and is hauled-off every 4 to 6 weeks (no treatment capability exists on-site). Other wastewaters generated in the plating processes are chromium, strong acid and alkaline, and rinse water streams. The industrial wastewater pretreatment system consists of a rinse water equalization unit, an acid treatment unit, an alkaline treatment unit, a chrome batch unit, pH pit, and a clarifier. The sludge process includes a sludge decant tank, a thickener tank, a filter press, and a sludge drier.

Permits: The facility holds a General NPDES Storm Water Permit ILR002888 with an expiration date of May 31, 2008, and the State Operating Pretreatment Permit 2005-EP-4651 with an expiration date of August 31, 2010. The facility is subject to categorical metal finishing pretreatment standards of 40 CFR Part 433.

The Metal Finishing Subcategory Pretreatment Standard 40 CFR Part 433 limits the following pollutants: Total Cyanide, Copper, Nickel, Total Chromium, Zinc, Lead, Cadmium, Silver, and Total Toxic Organics (TTO).

According to EPA and facility records, the facility has never been inspected for Industrial storm water compliance and the last Pretreatment Compliance Inspection was conducted by EPA on April 13, 1995. The facility has been in business since 1949 at this location.

Prior to the inspection I contacted the IEPA inspector, Mr. Dennis Conner in the Rockford Field Office and the City of Morrison Superintendent of Water and Sewer, Mr. Gary Tresenriter, and Operator Mr. Shane Osborn. Mr. Conner provided information about his latest inspection at the Morrison Treatment Plant which occurred in February 2006.

#### SITE INSPECTION

Before going to the facility, I stopped at the City of Morrison POTW to invite the city representatives to an inspection. Mr. Tresenriter and Mr. Osborn joined me for the inspection. At the entrance of the GE facility I presented my EPA credential and was invited to Mr. Schlueter's office. At that time I conducted an opening conference where I discussed the purpose of inspection, what records I wished to review, any safety concern/issues, and asked for a permission for taking photos. At the time of the inspection the GE workers were on vacation and the facility was not operating at all. Mr. James Cowser was newly-hired for an EHS manager and Mr. Schlueter, Plant Manager provided status of records/documents that were available, then conducted an inspection at the facility. There were subsequent follow-up phone calls with Mr. Cowser through which he provided necessary documents, records and requested information. EPA received the requested documents on July 24, 2006, August 3, 2006, September 1, 2006, and December 13, 2006.

The facility site review started at the Capillary Tube Plating Line (pictures1-3) and proceeded to the following areas: Ransohoff Aqueous Washer (picture 4), Zinc Barrel Plating Line (picture 5-12), Plating Waste Treatment Area (picture 13-21), effluent sampling location (picture 22-23), ISCO Sampler (picture 24), POTW Pit (picture 25), and the storm sewer (picture 26). Overall, the facility plating areas and manufacturing areas appeared to be in poor condition. Then later on, when Mr. Cowser provided updated photos and their descriptions on September 1, 2006, areas had been cleaned out and appeared to be in good condition.

#### **STORM WATER**

There are six storm water catch basins at the facility according to the site map which flow into storm sewers and to Rock River. During a follow-up conference call on 7/11/2006, Mr. Eric Johnson, GE Motors and Control Group Leader informed U.S. EPA that it is GE's policy that all floor drains be plugged in the manufacturing/plating areas to minimize access of any industrial activities to the storm water system. According to Mr. Schlueter, plant manager, the facility has secondary containment in the plating/manufacturing areas which route to a sump pump which pumps back to pretreatment system.

The facility operates three shifts and different operations at certain shifts (electroless nickel plating operation, tin plating line and fabrication aqueous wash area, and zinc plating line) which can caused potential problems for collecting representative grab and composite samples at the effluent sampling location. According to the compliance report, GE collects the samples at a certain time (grab and composite) which may not be the representative samples for their operations as required under 40 CFR 403.12 (g).

The facility appears to be in noncompliance with 40 CFR 122.26 (b)(14) for Storm Water Discharges Associated with Industrial Activity and 40 CFR 122.28 for

General Permits for storm water dischargers which indicate for failure to conduct annual inspection and failure to submit annual inspection report for 2005.

**DOCUMENT REVIEW** – The facility had a Notice of Intent (NOI), plant layouts and a site map, 2004 Annual Facility Inspection Report including Storm Water Pollution Prevention checklist, Storm Water Pollution Prevention Plan (SWPP Plan) dated Nov. 1994, Spill Prevention Control and Countermeasure Plan (SPCC Plan) dated Dec. 1999, and a List TRI Chemicals under Form R Releases RY 2005.

#### **EXIT BRIEFING**

The exit briefing was very brief on 6/29 and a follow-up conference call was on 7/11/2006, with GE representatives: Eric Johnson, GE Group Leader; Kevin Schlueter, Plant Manager; James Cowser, EHS Manager; David Bond, Facility Manager; and Larry Vanderton, Laboratory Technician.

Specifically Storm Water program was covered and what is required under the program and what documents are needed, and informed the compliance assistance HQ Website. We have received all the necessary documents on July 24, 2006, August 3, 2006, and September 1, 2006.

#### POTENTIAL VIOLATIONS -

The potential violations are:

- 1. failure to conduct storm water inspection (General Permit section E.8), and
- 2. failure to submit required annual inspection report (General Permit section G.1).

LIST OF ATTACHMENTS (all evidence of non compliance should be attached)

- A) Inspection Photographs
- B) Inspection Checklist
- C) EPA Form 3560

United States Environments Washington, D.6			·				
Water Compliance In			` (				
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Inspection Work Days Facility Self-Monitoring Evaluation Rating 67 69 70 70	BI QA 71 72 73	Res	erved80				
Section B: Facility Data							
Name and Location of Facility Inspected (For industrial users discharginclude POTW name and NPDES permit number)	ging to POTW, also Entry	Time/Date	Permit Effective Date				
General Electric Company	,		June 1,2003				
709 West Wall Stree	Exit		Permit Expiration Date				
Morrison, IL. 61270		:00p.M.	May 31, 2008				
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number	er(s) Othe	er Facility Data (e.g., criptive information)	SIC NAICS, and other				
James Cowson/EHS Man		714/382	22				
(815) 772-1349		lotor vehi	cle parts and				
Name, Address of Responsible Official/Title/Phone and Fax Number	Co-to-to-d	accessories					
Kevin Schlueter/ Plant Mana	Jer X Yes I No	-000001100	'				
(815) 112-1260							
Section C: Areas Evaluated During	g Inspection (Check only thos	e areas evaluated	0				
V Permit Self-Monitoring Prog		MS	4				
✓ Records/Reports     Compliance Schedu       ✓ Facility Site Review     ✓ Laboratory	les Pollution Prevention  V Storm Water	on					
Effluent/Receiving Waters		Overflow					
Flow Measurement Sludge Handling/Dis		verflow					
	nmary of Findings/Comments	Violation codes	e nacassan/l				
(Attach additional sheets of narrative and check SEV Codes SEV Description		Violation codes, c	10000001)/				
BONDO Failure to submit rea	juived report						
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Signature of Management Q A Reviewer	Agency/Office/Phone and Fax N	lumbers	Date				
Organization Managorinom & Common	,	•					

### FY 2006 MANUAL INSPECTION CONCLUSION DATA (ICDS) FORM

1.	Region: 5 Facility Name/Location:
	General Electric Company
	General Electric Company 709 West Wall Street, Morrison, IL. 61270
2.	General Facility Permit ID or Media-Specific Permit ID number (e.g. NPDES permit #):
	ILRØ\$ 2888
3.	SIC (4-digit): 3714/3822 OR NAICS Code (5-digit):
4.	Date of Inspection: $\frac{06/29/2006}{100}$ (mm/dd/yyyy)
5.	Inspection/Media Type: Industrial Storm Water
6.	Deficiencies:
Check	one or more of the following:
Potentia	l violation of a compliance schedule in an enforceable order
Potentia	I failure to maintain a record or failure to disclose a document
Potentia	l failure to maintain, inspect or repair equipment including meters, sensors, and recording equipment I failure to complete or submit a notification, report, certification, or manifest
Potentia	l failure to obtain a perímit, product approval, or certification
Potentia	l failure to follow a required sampling or monitoring procedure or laboratory procedure
	l failure to follow or develop a required management practice or procedure I failure to identify and manage a regulated waste or pollutant in any media
	I failure to report regulated events such as spills, accidents, etc
Potentia	d incorrect use of a material (e.g., pesticide, waste, product, etc.) or use of improper or unapproved
materia	<u> </u>
Potentia	d failure to follow a permit condition (s)
	Vo Diving the last invariant of the Socility during the imprestion? WVoc
7.	If yes: Did you communicate the deficiencies to the facility during the inspection? Yes
	□ No
8.	Actions Taken: Did you observe the facility take any actions during the inspection to address
<b>0.</b>	the deficiencies communicated?  Will look into those since the EHS Manager is new   Action(s) taken  Verified compliance with previously issued enforcement action
	Will look into those since the EHS Manger is new
	Action(s) taken at the Partitu
	Verified compliance with previously issued enforcement action
	Corrected recordkeeping deficiencies
	Corrected monitoring deficiencies
-	Completed a notification or a report Requested a permit application
	Implemented new or improved management practices or procedures
	Improved pollutant identification(e.g., labeling, manifesting, storage, etc.)
	Reduced pollution(e.g., use reduction, industrial, process change, emissions
	or discharge change, ec.). Specify the pollutants(s) reduced only if this action is checked.
-	
9.	Assistance: Did you provide general assistance based on national policy? Yes No
	Did you provide site specific assistance based on national policy ? Yes $\square$ No
Option	nal Information: Describe actions taken or assistance provided to assist facility.

#### INDUSTRIAL USER INDUSTRIAL STORM WATER INSPECTION

(Last Rev.4/25/2006-PK)

) Permit information		<u> </u>	<u> </u>	
Permit Type	Application Date	Coverage/Issue Date	Permit #	Copy Available
Individual NPDES Industrial Storm Water				
General Permit Notice of Intent	11/22/02	May 30, 2003	ILR 44 2888	<b>V</b>
General Group Application				
ubmitted to State, NPDES Seconds, BMP compliance donembers, and copy of 8 ½ x 11	Stormwater Pericumentation, tr property layou	aining records for t depicting storm w	signed SWPP training of stater drainage	P, inspection SWPPP team and control
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#### A list of codes the rule applies to are listed in Attachment A.

	The of cours are applied to the house in the manner.
5)	For transportation facilities under SIC codes 40, 41, 42, 43, 44, 45, and 5171: Are there operations at the facility relating to vehicle maintenance (vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), equipment cleaning (including truck, trailer, or other vehicles washing) and airport deicing that occur or discharge outside? Yes. No. Describe operations and discharges.
6)	Has the facility developed a storm water pollution prevention plan (or, if appropriate, an erosion and sediment control plan)? (Ves.) (Date completed: No. No.
	If yes: A. Training listed and records available? B. State defined (frequency) inspections and records available? C. Control practices and BMP listed and records available? D. Site has spill plan? Yes. SPCC (Dec 99) E. SWPPP has been certified and dated by Qualified Professional, and signed and dated by Responsible Individual.
7)	Are industrial processes, materials and activities exposed to storm water? Describe conditions and waste/material piles stored on-site. Walk around the site. With a copy of the site map, note outfalls and material handing areas, if possible.
	Sites for storage and maintenance of material handling equipment  Sites for residual treatment storage and disposal  Shipping, receiving, and loading areas  Manufacturing buildings  Storage areas (including tank farms) for raw materials and intermediate and finished products;  Scrap storage areas or waste piles (including machined oiled metal shavings, etc.)

Explain:

water

Roads

Current raw material storage

Construction debris

8) If there is no exposure as evidenced by the above listed walk around the site, and if the facility is not covered by SIC or Narrative Description, has the site considered, submitted, and/or received a "No Exposure Certification" approved exemption. from the authorized state permit authority?

Areas of past industrial activity where significant materials remain exposed to storm

ţ

b) Areas of concern

None,

14) Further Inspection Recommended? Yes

### ATTACHMENT A SIC Codes which Trigger Stormwater Permit

DESCRIPTION	SIC CODE	NAICS CODE
Lumber and wood products except furniture	24	
Paper and allied products	26	
Chemicals and allied products	28	
Petroleum refining and related industries	29	
Stone clay glass and concrete products	32	
Primary metal industries	33	
Fabricated structural metal	3441	·
Ship and boat building and repair	373	
Metal mining	10	
Coal mining *	12	
Oil and gas extraction	13	
Mining and quarrying of nonmetallic minerals	14	
RECYCLING FACILITIES	· · · · · · · · · · · · · · · · · · ·	
Used motor vehicle parts	5015	
Scrap and waste materials	5093	
TRANSPORTATION FACILITIES		
Rail road transportation	40	
Local and suburban transit and interurban highway passenger transportation	41	
Motor freight transportation and warehousing	42	
U.S. Postal Service	43	
Water transportation	44	
Transportation by air	45	
Petroleum bulk stations and terminals	5171	

RE 3-2. DING NO. 14 WASTEWATER SOURCE LOCATION FRAL ELECTRIC CONTROL PRODUCTS RISON, ILLINOIS

Environmental Consulting & Technology, Inc.

ECT, 1994.



## NOTICE OF INTENT (NOI)

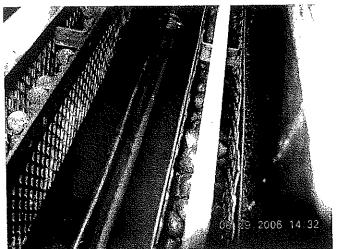
# GENERAL PERMIT TO DISCHARGE STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITY

(EXCLUDING CONSTRUCTION ACTIVITY)

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This Agency is sutherized to require this information under tilingle Revised Systems, 1991, Chapter 111 1/2, Section 1029. Displaying information is required under that Section. Fallows to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the forms Management Center.

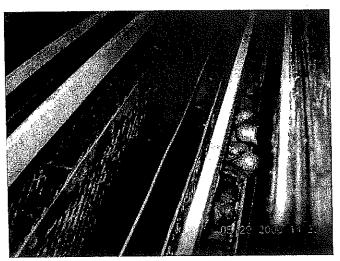
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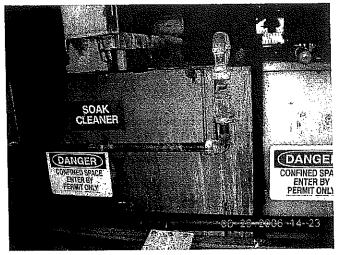
Picture1. Capillary Tube Plating Line (Acid Tin Plating Cell)



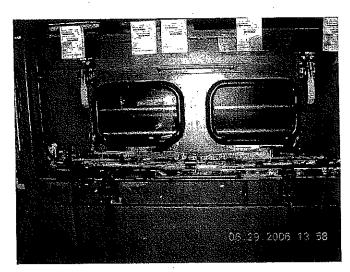
Picture 2. Capillary Tube Plating Line (Cleaner Cell)



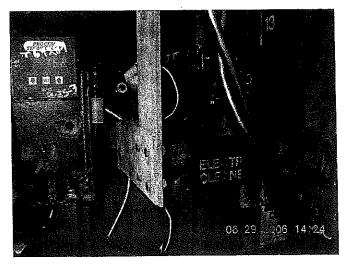
Picture 3. Capillary Tube Plating Line (Acid Tin Plating Cell)



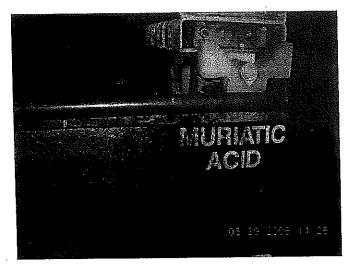
Picture 5. Zinc Barrel Plating Line (Soak Cleaner Tank)



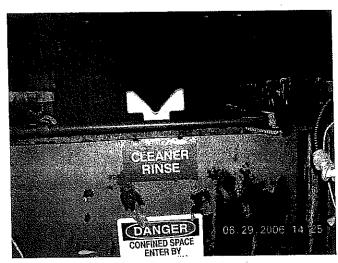
Picture 4. Ransohoff Aqueous Washer (Operation to pre-wash fabricated parts prior to metal finishing.



Picture 6. Zinc Barrel Plating Line (Electro Cleaner Tank)



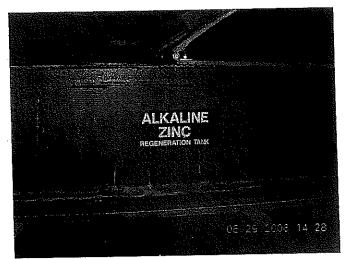
Picture7. Zinc Barrel Plating Line (Muriatic Acid Tank)



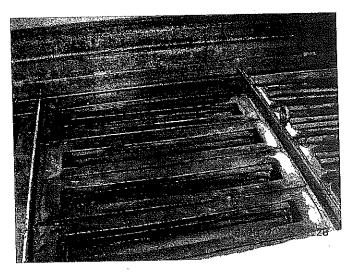
Picture 8. Zinc Barrel Plating Line (Cleaner Rinse Tank)



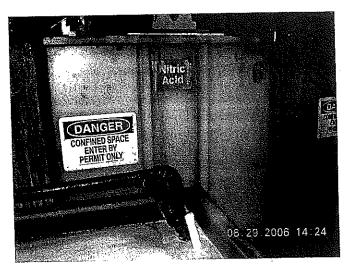
Picture 9. Zinc Barrel Plating Line (Zinc Plating Bath)



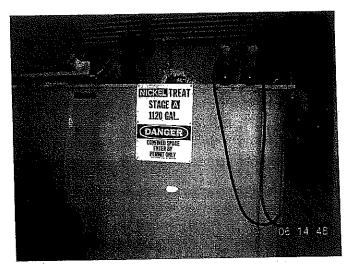
Picture 10. Zinc Barrel Plating Line (Zinc Generator Tank)



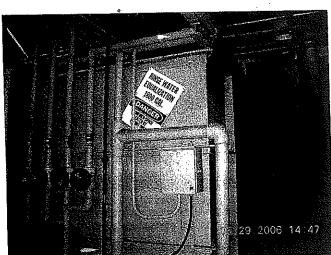
Picture 11. Zinc Barrel Plating Line (Zinc Generator Tank filled with zinc balls)



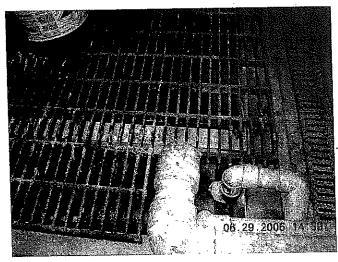
Picture 12. Zinc Barrel Plating Line (Nitric Acid Tank)



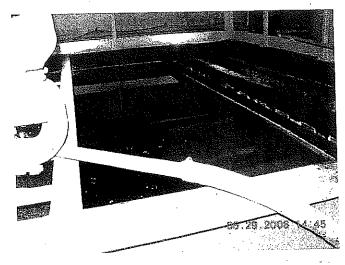
Picture 13. Plating Waste Treatment Area (Nickel Treat Tank)



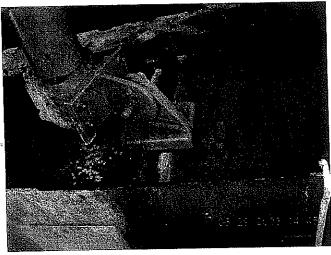
Picture 14. Plating Waste Treatment Area (Equalization Tank)



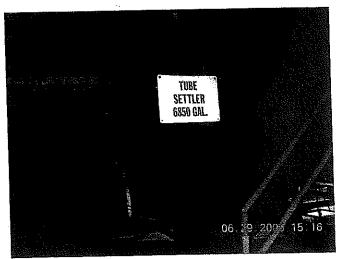
Picture 15. Plating Waste Treatment Area (pH Adjust Pit)



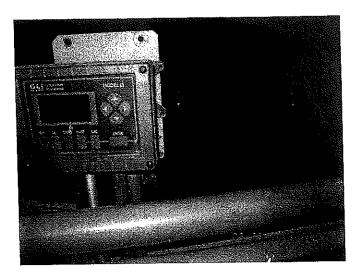
Picture 16. Clarifier (to precipitate metal ions to final pH adjust tank)



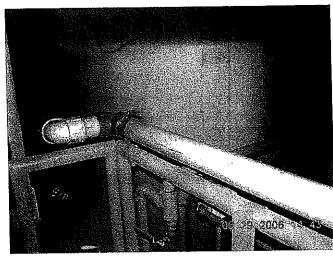
Picture 17. Clarifier (from pH pit entering influent)



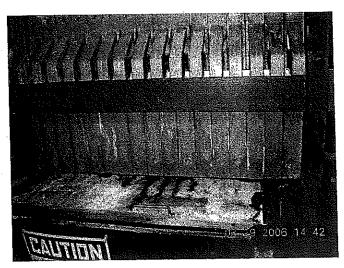
Picture 18. Clarifier (of cone bottom tank for sludge accumulation)



Picture 19. Final pH Adjust Tank



Picture 20. Decant Tank to store sludge



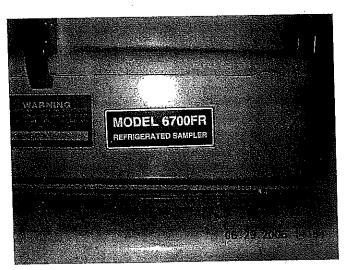
Picture 21. Sludge Filter Press



Picture 22. Outflow Trench (effluent flowing over weir into trench to POTW)



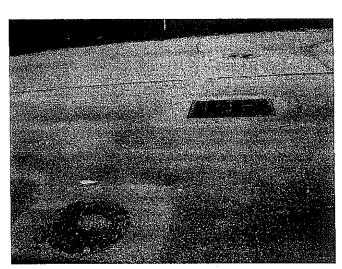
Picture 23. Outflow Trench (effluent flowing over weir for continuous flow measurements)



Picture 24. ISCO Sampler



Picture 25. POTW Pit (Final pit which discharges to the POTW)



Picture 26. Storm Sewer